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Attorney for Defendant

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

BARRY N. KAY, individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

COPPER CANE, LLC d/b/a COPPER  
CANES WINES & PROVISIONS, a  
California corporation,

Defendant.

Case No.: 3:20-cv-04068-RS

**JOINT STIPULATION REQUESTING  
AN EXTENSION OF ALL DEADLINES,  
INCLUDING TIME FOR DEFENDANT  
TO RESPOND TO COMPLAINT;  
ORDER AS MODIFIED BY THE COURT**

[Fed. R. Civ. P. 6(b)(1)(A)]

Judge: The Honorable Richard Seeborg  
Action Filed: June 18, 2020

**JOINT STIPULATION REQUESTING AN EXTENSION OF ALL DEADLINES,  
INCLUDING TIME FOR DEFENDANT TO RESPOND TO COMPLAINT; ORDER**

Pursuant to Local Rule 6-1(b), the parties to this action, by and through their respective Counsel, stipulate and jointly request that this Court extend all pre-trial deadlines, including the deadline for Defendant to respond to the complaint, by at least 45 days, or as soon thereafter as is convenient to the Court.

The parties are investigating the allegations in the complaint and are in the midst of negotiations that may prevent any further action in this matter. As a result, the parties request additional time for Defendant to prepare and file its response to the complaint to avoid unnecessary expenditure of this Court's time or the parties' resources.

No previous extensions of time have been sought in this matter by either party. The only effect of this extension will be to move the Rule 16 conference. The parties anticipate no other effects.

Event	Current Deadline	New Deadline
Response to Complaint	August 24, 2020	October 8, 2020
ADR Certification	September 1, 2020	October 16, 2020
Case Management Statement	September 17, 2020	November 5, 2020
Initial Case Management Conference	September 24, 2020	November 12, 2020

IT IS SO STIPULATED.

Dated: August 20, 2020

HOLLAND & KNIGHT LLP

By: 

Sarah A. Marsey  
Attorneys for Defendant

Dated: August 20, 2020

CARLSON LYNCH LLP

By: 

Edwin J. Kilpela  
James P. McGraw  
Todd D. Carpenter  
Attorneys for Plaintiff

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**SIGNATURE ATTESTATION**

Pursuant to Northern District of California, Civil Local Rule 5-1(i)(3), the undersigned hereby attests that concurrence in the filing of the present Joint Stipulation has been obtained from each of the other signatories. The undersigned shall maintain records to support this concurrence for subsequent production for the Court, if so ordered, or for inspection upon request by a party, until one year after the final resolution of the action (including appeal, if any).

Respectfully submitted,

DATED: August 20, 2020

HOLLAND & KNIGHT LLP

  
 Sarah A. Marsey (SBN 297911)

Attorney for Defendant

**ORDER**

The Court having reviewed the foregoing Joint Stipulation and good cause appearing therefore:

IT IS HEREBY ORDERED that all pretrial deadlines are extended by 45 days. Defendant's deadline to respond to the Complaint is extended from August 24, 2020 to October 8, 2020. Initial Case Management Conference continued to **November 12, 2020 at 10:00 am** to be held telephonic. All parties shall appear telephonically and must contact Court Conference at (866) 582-6878 at least one week prior to the Conference to arrange their participation.

IT IS SO ORDERED:

Date: August 20, 2020

  
 UNITED STATES DISTRICT COURT JUDGE

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